MR#347693

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Via Federal Express

Document Processing Center (Mail Code 7407M)
Room 6428
Attention: 8(e) Coordinator
Office of Pollution Prevention and Toxics
U.S. Environmental Protection Agency
1201 Constitution Ave., NW
Washington, DC 20004

Dear 8(e) Coordinator:

Mixture based on fluorinated hydrocarbon, aliphatic glycol ether, silicone

The study was designed to assess eye irritation potential of the test substance following a single instillation into the rabbit eye. Three rabbits were each administered a single ocular dose of a volume of 0.1 ml of the test substance, and observed for up to four days after instillation. Dulling of the normal luster of the cornea was observed in one animal. A diffuse beefy red coloration of the conjuctivae and swelling with partial eversion of eyelids was seen in one animal, one hour after instillation. A diffuse crimson coloration of the conjuctivae and swelling with slight to partial eversion of eyelids was observed in the remaining two animals. These reactions had resolved by Day 4 or 5. Instillation of test substance into the rabbit eye elicited transient, well-defined to severe conjunctival irritation.

Sincerely,

Company Sanitized

Company Sanitized

TSCA §8(e) SUBMISSION
SUBSTANTIATION OF CONFIDENTIALITY CLAIM

Substantiation Questions

1. Is your company asserting this confidential business information (CBI) claim on its own behalf?

   Yes.

   If the answer is no, please provide company name, address and telephone number of entity asserting claim.

2. For what period do you assert your claim(s) of confidentiality? If the claim is to extend until a certain event or point in time, please indicate that event or time period. Explain why such information should remain confidential until such point.

   The claim of confidentiality is requested permanently, or until the submitter makes the information common knowledge.

3. Has the information that you are claiming as confidential been disclosed to any other governmental agency, or to this Agency at any other time? Identify the Agency to which the information was disclosed and provide the date and circumstances of the same. Was the disclosure accompanied by a claim of confidentiality? If yes, attach a copy of said document reflecting the confidentiality agreement.

   [
   ]

4. Briefly describe any physical or procedural restrictions within your company relating to the use and storage of the information you are claiming CBI.

   [ ].

5. If anyone outside your company has access to any of the information claimed CBI, are they restricted by confidentiality agreement(s). If so, explain the content of the agreement(s).

   [
   ]

6. Does the information claimed as confidential appear or is it referred to in any of the following:

   a. Advertising or promotional material for the chemical substance or the resulting and product;

   [ ].

   b. Material safety data sheets or other similar materials (such as technical data sheets) for the substance or resulting end product (include copies of this information as it appears when accompanying the substance and/or product at the time of transfer or sale);

   [ ].

   c. Professional or trade publications;

[ ].

d. Any other media or publications available to the public or to your competitors.

[ ].

If you answered yes to any of the above, indicate where the information appears, include copies, and explain why it should nonetheless be treated as confidential.

7. Has EPA, another federal agency, or court made any confidentiality determination regarding information associated with this substance? If so, provide copies of such determinations.

   No.

8. Describe the substantial harmful effects that would result to your competitive position if the CBI information is made available to the public? In your answer, explain the causal relationship between disclosure and any resulting substantial harmful effects. Consider in your answer such constraints as capital and marketing cost, specialized technical expertise, or unusual processes and your competitors access to your customers. Address each piece of information claimed CBI separately.

   Disclosure of the claimed CBI may result in harmful effects on submitter's competitive position. Disclosure of the claimed CBI could permit a competitor to specifically know and understand the submitter's research efforts with this test substance and to forego the necessary time and expense to develop such a substance.

9. Has the substance been patented in the U.S. or elsewhere? Is a patent for the substance currently pending?

   [
   ]

10. Is this substance/product commercially available and if so, for how long has it been available on the commercial market?

    [ ]

    a. If on the commercial market, are your competitors aware that the substance is commercially available in the U.S.?

    [ ]

    b. If not already commercially available, describe what stage of research and development (R&D) the substance is in, and estimate how soon a market will be established.

    [ ].

    c. What is the substance used for and what type of product(s) does it appear in.

    [ ]

11. Describe whether a competitor could employ reverse engineering to identically recreate the substance?

[ ].

12. Do you assert that disclosure of this information you are claiming CBI would reveal:

a. Confidential processes used in manufacturing the substance;

No.

b. If a mixture, the actual portions of the substance in the mixture; or

No.

c. Information unrelated to the effects of the substance on human health or the environment?

Yes.

If your answer to any of the above questions is yes, explain how such information would be revealed.

[ ].

13. Provide the Chemical Abstract Service Registry Number for the product, if known. Is your company applying for a CAS number now or in the near future? If you have applied for a CAS number, include a copy of the contract with CAS.

[ ].

14. Is the substance or any information claimed CBI the subject of FIFRA regulation or reporting? If so, explain.

No.